

EXHIBIT B

VERIFICATION OF GARY CUPPELS

I, Gary Cuppels, of 26650 Carlisle Drive, Millsboro, Delaware 19966 do hereby depose and say the following:

1. My property is situated on the Indian River and is downgradient of the Mountaire plant, its spray and sludge fields.

2. My well water is highly contaminated with nitrate and other contaminants caused by Mountaire's wastewater and sludge disposal.

3. I came home one day in the Fall of 2017 to find a case of bottled water and a water cooler from my "*friends at Mountaire*" with no explanation.

4. At that time, my wife and I had been having serious health and gastrointestinal issues that we now know were caused by the water. After suffering with these issues for many months, we moved to our winter residence in Florida to recover. It took my wife many months before her issues resolved. Nevertheless, we were reluctant to return to our home in Delaware.

5. I regularly use the Indian River for recreational activities such as boating, swimming, kayaking, crabbing and fishing.

6. I have reason to believe that Mountaire's spray irrigation and sludge disposal has contaminated the Indian River and interrupts my ability to use it for recreational activities.

7. Neither the proposed consent decree between Mountaire and DNREC nor the draft permits publicly noticed by DNREC on April 29, 2020 adequately address the groundwater contamination and water quality issues that are important to many people who use the Indian River for recreation and groundwater for private drinking water wells.

8. I have read the comments prepared by our attorney Chase Brockstedt to be filed with DNREC's Public Hearing Officer Lisa A. Vest in

connection with the draft construction permit and draft spray irrigation operations permit (Docket #2020-P-W-0014) public hearing Scheduled for May 21,2020 and adopt his comments as submitted.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.



GARY CUPPELS